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June 23, 2016

Via E-mail and First Class Mail

Ms. Leticia Lane
Regional Freedom of Information Act Officer
USEPA Region 6
Information Management Section (6MD-OE)
1445 Ross Avenue
Dallas, TX 75202-2733
lane.leticia@epa.gov

Re: *Request for Information Regarding Potentially Responsible Party Designation in Association with the RSR Corporation Superfund Site, TXD079348397: Dallas Power and Light Company and/or its Corporate Successor, Oncor*

Dear Ms. Lane:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 *et seq.*, I hereby request records upon which the Environmental Protection Agency Region VI ("EPA") determined the status of Dallas Power and Light Company ("DP&L") and Oncor ("Oncor") (collectively "DPL/Oncor") as a Potentially Responsible Party ("PRP") pursuant to Section 107 of the Comprehensive Environmental Response ("PRP"), Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9607, in respect of the RSR Corporation Superfund Site ("Site").

Collectively, the information sought herein constitutes "records." The term "record" as contemplated by 40 CFR § 2.100(b) and that relate to this request includes hard copy documents (both hand-written notes, telephone logs, and other type-script materials) as well as electronic media, which include computer disks and portable storage devices, documents and e-mail messages on computer hard drives and portable storage devices that EPA, its contractors, and any other third parties have generated prior, and up to, the date of this request.

In the event EPA determined the PRP status of DP&L/Oncor due to its having been an owner or operator of a facility or facilities within the Site, or due to its status as any other form of

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“Covered Person” pursuant to CERCLA Section 107(a), 42 U.S.C. § 9607(a), I request the location of such a facility or facilities, and all records by which EPA made any and all determinations that such party was a PRP in respect of the Site and any facilities located therein.

In addition, in the event DP&L/Oncor has entered into any form of civil administrative or judicial settlement with EPA or any other agency of the United States pursuant to CERCLA Sections 122, 42 U.S.C. § 9622, that relate to the performance by DP&L/Oncor of response actions within the Site or to the reimbursement of response costs associated with the Site, I request all relevant records that are in EPA’s possession.

In the event that you deny in whole or in part this request, I remind you of the requirement under 40 CFR § 2.104(h) that the Agency timely identify the records withheld and state the basis for denial for each record or category of records being withheld.

Please do not hesitate to contact me at (214) 692-8385 or dugdale@gsfpc.com should you require any clarification regarding this request. Thank you for your assistance.

Very truly yours,



John Dugdale

cc: George Malone Esq., EPA